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LATHAM & WATKINS LLP

March 3, 2022

VIA ECF

Hon. Kevin McNulty, U.S.D.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

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Re: *Hu, et al. v. BMW of North America LLC, et al.*
Case No. 18-4363 (KM) (JBC) (D.N.J.)

Dear Judge McNulty:

Latham & Watkins LLP, counsel for Defendant Bayerische Motoren Werke Aktiengesellschaft (“BMW AG”) and BMW of North America, LLC (“BMW NA”), hereby informs the Court that attorney Michael Lacovara recently passed away, and requests that the Court withdraw his *pro hac vice* appearance as counsel in this matter. Mr. Lacovara had previously appeared and represented BMW AG and BMW NA in this matter, along with Kevin M. McDonough, Arthur F. Foerster (admitted *pro hac vice*), Johanna Spellman (admitted *pro hac vice*), Elizabeth Parvis (admitted *pro hac vice*), and Kevin Jakopchek (admitted *pro hac vice*) who will continue to represent BMW AG and BMW NA in this matter. All future correspondence and papers in this action should continue to be directed to Kevin M. McDonough.

Given Latham & Watkins LLP’s continued representation of BMW AG and BMW NA, Mr. Lacovara’s withdrawal will have no material effect on the schedule in this matter, nor will it cause prejudice to any party. In light of the foregoing, I respectfully request that the Court relieve Mr. Lacovara as counsel and that the official court docket be amended to reflect this change.

Thank you for your attention to this request.

LATHAM & WATKINS^{LLP}

Respectfully submitted,

/s/ Kevin M. McDonough
Kevin M. McDonough

cc: All counsel of record (via ECF)